

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>UNITED STATES OF AMERICA, )</b>	)	<b>CRIMINAL CASE NO.</b>
	)	
<b>v.</b>	)	<b>2:23-CR-012</b>
	)	
<b>PATRICK JOHN AGNEW,</b>	)	
<b>Defendant.</b>	)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL  
MOTIONS**

COMES NOW, the Petitioner above-named, by and through undersigned counsel, and files this his Motion for Extension of Time to File Pretrial Motions in the above-captioned matter. In support thereof, Petitioner shows as follows:

1. The Petitioner's Pretrial Motions are currently due on or before January 25, 2024 in the above-captioned matter.

2. Undersigned is lead counsel for the Defendant in *State of Georgia v. Quamarvious Nichols*, Case No. 22SC183572, in which trial commenced on January 4, 2023, at 9:00 a.m., before Judge Glanville, in the Fulton County Superior Court.<sup>1</sup> This is a RICO case with multiple defendants.<sup>2</sup> The trial is anticipated to last 4-6 months. *See Exhibit A attached hereto.*

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<sup>1</sup> The case is State v. Khalieff Adams, No. 22SC183572, Superior Court of Fulton County, Chief Judge Ural Glanville presiding.

<sup>2</sup> There are currently 6 defendants on trial, all in custody.

3. Counsel requested the approval of Jennifer Keene, Assistant United States Attorney, who consents to this motion.

4. The Defendant requests an additional (45) days from January 25, 2024 in which to submit his pretrial motions in the above-captioned matter.

WHEREFORE, based upon the foregoing, the undersigned requests that the Court enter an Order granting this motion and allow him an additional forty five (45) day extension from January 25, 2024 to file Pretrial Motions.

This 24 day of January 2024.

Respectfully submitted,

/s/ Bruce S. Harvey  
LAW OFFICE OF BRUCE S. HARVEY  
ATTORNEY FOR PETITIONER  
Bruce S. Harvey, #335175  
[bruce@bharveylawfirm.com](mailto:bruce@bharveylawfirm.com)  
146 Nassau Street, NW  
Atlanta, Georgia 30303  
(404) 659-4628